

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 6, 2014

**VIA EMAIL**

Dr. Cisse Spragins  
Chief Executive Officer  
Rockwell Labs Ltd  
1257 Bedford Avenue  
North Kansas City, MO 64116

Subject: Label Amendment – Minor Amendment & Clarification of Marketing Claims and Logos  
Product Name: BorActin Insecticide Powder  
EPA Registration Number: 73079-4  
Application Date: June 14, 2012  
Decision Number: 492584

Dear Dr. Spragins:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is **acceptable**.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

**SEE NEXT PAGE**

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Michael Walsh by phone at (703) 308-2972, or via email at "walsh.michael@epa.gov".

Sincerely,

A handwritten signature in black ink that reads "Mark ES". The "M" is large and stylized, with "ark" written in a smaller, cursive script. The "ES" is written in a large, bold, cursive font.

Mark Suarez, Product Manager 13  
Insecticide Branch  
Office of Pesticide Programs

## BorActin™ Insecticide Powder

Kills: Roaches, Palmettobugs, Waterbugs, Ants\*, Silverfish, Firebrats, Stink Bugs and Darkling Beetles

\*Excluding Carpenter Ants

New Construction: Preventative Treatment for Roaches and Drywood Termites

Active Ingredient: Orthoboric Acid.....99%

Other Ingredients:.....1%

Total:.....100%

EPA Reg. No.: 73079-4

EPA Est. No.: as applicable

Net Contents: 4 oz, 8 oz, 1 lb,  
5 lbs, 10 lbs, 25 lbs, 50 lbs

**ACCEPTED**

Aug 06, 2014

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 73079-4

### KEEP OUT OF REACH OF CHILDREN

#### CAUTION

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid contact with eyes or clothing. Avoid breathing dust. Wash hands thoroughly with soap and water after use and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

#### First Aid

If Swallowed: Call a doctor or poison control center for treatment advice. Drink 1 to 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting. If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. If on Skin: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product or label with you when calling a Poison Control Center or doctor or going for treatment. In case of emergency, for additional information call 800 858 7378.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, transport vehicles, sewers, animal rearing and handling establishments, food handling and food processing establishments, poultry houses and new building construction.

**Application Rates and Methods:** As a dust: Apply using a bellows or other appropriate duster at a rate of 1 lb per 1000 sq ft. As a liquid: Mix 1 lb per gallon of water and apply at a rate of one gallon per 1000 sq ft. Make up only the amount of solution to use that day. As a foam: Mix as for liquid

and add the appropriate amount of foaming agent. Apply foam in sufficient quantities to fill treated voids. As a mop solution: As a supplemental treatment, mix one cup of product per gallon of mop water. Make up only enough for current application and reapply as needed. Remove or brush any powder visible after treatment into cracks and crevices. After mopping, up to a quart of mop solution can be poured into each floor drain to control drain flies.

**Indoor Application:** Insure that no powder is visible in living areas after application. If any powder is left visible, it should be brushed into cracks and crevices or removed. Apply only in areas inaccessible to children and pets. Do not contaminate food or feedstuffs. For food area application, see directions below.

Apply in attics, crawl spaces, trash closets, utility closets, around the perimeter of dropped ceilings, under and behind appliances and vending machines, in wall voids and voids under and behind cabinets, sinks and tubs, in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:

1. In attics, be sure to get powder near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and powder dusted into drawer wells. No powder should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but powder should not be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary. As a separate matter from the use of this product, it is advisable to fix any leaks to minimize structural damage and odors, and to prevent potential chronic insect problems.

**Food Processing, Handling and Service Establishment Application:** Places other than private residences where exposed food is held, processed, prepared or served.

Be careful to avoid depositing product onto exposed surfaces or introducing the product into the air. Do not contaminate food or food processing surfaces. **APPLICATIONS OF THIS PRODUCT IN THE FOOD AREA OF FOOD HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED.**

Apply sparingly into cracks and crevices, such as along baseboards and between construction elements. **Food areas include:** processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, when facility is in operation and food is exposed.

**Serving Areas:** Areas such as dining rooms where prepared food is served, but not preparation and holding areas. Apply as a spot treatment into cracks and crevices, such as along baseboards and between construction elements. Do not treat surfaces likely to be contacted by food. (Do not apply when facility is in operation or when food is exposed.)

**Non-food areas include:** mechanical rooms, trash rooms, bathrooms, offices, garages, maintenance rooms, locker rooms, floor drains leading to sewer entries, janitorial closets, and storage areas after canning or bottling. Apply along baseboards, around pipes and behind and beneath sinks, pallets, lockers, equipment and other areas where insects may hide or enter.

**Sewers:** Apply with a power duster or portable blower at a rate of not more than 8 lbs per 3000 square feet.

**New Construction Pre-Treats:** For the prevention of drywood termites and roaches, apply at a rate of 4 lbs per 1000 square feet. Apply around the edges of attics near the eaves and around vent stacks. Also apply along baseplates and in plumbing voids. Personal Protective Equipment: In California wear normal work clothing (e.g. long sleeve shirt, long pants, shoes plus socks) and a NIOSH/MSHA approved dust mask respirator.

**Poultry Houses:** For darkling beetle control, remove birds prior to application and apply at a rate of 1-2 lbs per 100 square feet over the soil surface or over the old litter. Before re-introducing birds, apply fresh litter at least 4 inches deep to all floor areas. Powder should also be applied to wall voids, framing and insulation of the house. Do not apply directly to manure piles or pits. For ongoing control, re-apply powder each time the house is cleaned or after each grow-out period.

### **Storage and Disposal**

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If empty: Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

### ***Optional Alternate Disposal Statement for 25 lb pail, 10 lb pail, 5 lb pail, 1 lb puffer bottle, 8 oz puffer bottle or 4 oz puffer bottle:***

This storage/application container may be refilled by the end-user of the product. Refill only with BorActin Insecticide Powder.

Disposal: If empty: Do not reuse this container for any other purpose. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

### **[Warranty Limitations and Disclaimer**

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, manufacturer shall not be liable for any consequential damages based on the use of the product.]

NOTE: *Bold italicized text is information for the reader and not part of the label.*  
*[Bracketed information is optional text.] Text separated by / denotes and / or options.*

Manufactured by: Rockwell Labs Ltd [logo]  
1257 Bedford Ave  
[North] Kansas City, MO 64116  
[Phone number / Web address]

[© XXXX] [Trademark(s) ownership statement]  
[Green Zone is not a third party certification.] *Used when Green Zone Brand logo is used.*

**Marketing Claims**

[Long-Lasting / Odorless Powder]  
[WBE Woman Business Enterprise NWBOC Certified (logo)] *As factual based on company certification*

*Logo depicted below in grayscale – may be colorized in actual use*  
[Formulated in the USA [(logo)]] *As applicable*

*Logo depicted below in grayscale – may be colorized in actual use*  
[Formulated in Missouri [(logo)]] *As applicable*

*Logo depicted below in grayscale – may be colorized in actual use*  
[Formulated in the Heartland [(logo)]] *As applicable*

*Logo depicted below in grayscale – may be colorized in actual use*  
[Green Zone Brand [(logo)]]

*Logo options depicted below in grayscale – may be colorized in actual use*

